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Attorneys for Defendant,
ALFA LAVAL INC.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION
AT LAW AND IN ADMIRALTY

SUSAN PAYNE, INDIVIDUALLY and)	Case No. 2:20-cv-01198-TLN-AC
as Successor-in-Interest to Decedent)	
DENNIS C. PAYNE, and EMILY)	JOINT STIPULATION AND
PAYNE and SAMUAL PAYNE,)	[PROPOSED] ORDER
Individually,)	AMENDING DEADLINES FOR
)	EXPERT DISCOVERY CUT-OFF
)	AND DISPOSITIVE MOTIONS
Plaintiffs,)	
vs.)	
)	
ABB, INC., et al.,)	Complaint Filed: March 20, 2020
)	FAC Filed: September 4, 2020
Defendants.)	SAC Filed: March 21, 2023
)	

Defendants collectively including ALFA LAVAL INC. (“Alfa Laval”) and Plaintiffs SUSAN PAYNE, EMILY PAYNE, and SAMUAL PAYNE through their respective counsels, agree and stipulate to the following amendments to the Amended Pretrial Scheduling Order issued by this court, specifically sections V and VII, Document #153 filed on June 2, 2023. These amendments are based on good cause as

the parties need additional time to conduct expert discovery due to the number of experts involved in this case and their schedules. As such, the parties agree to continue the deadline for dispositive motions two weeks after the close of expert discovery.


1. Expert Discovery will close on April 19, 2024.
2. The last day to file dispositive motions will be May 3, 2024.

It is so agreed that the Stipulation may be signed in counterparts and that facsimile or scanned signatures may be deemed as originals for all purposes.

SO STIPULATED.

Dated: February 26, 2024

HAWKINS PARNELL & YOUNG LLP

By: 

Ana T. Reeg
Attorneys for Defendant,
ALFA LAVAL INC.

Dated: February 26, 2024

FROST LAW FIRM, PC

By: */s/ Andrew Seitz*

Andrew Seitz
Scott L. Frost
Attorneys for Plaintiffs
SUSAN PAYNE, DENNIS C. PAYNE

1 Dated: February 26, 2024

KELLER & HECKMAN LLP

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3 By: /s/ Rohit Sabnis

4 Rohit Sabnis

5 Attorneys for Defendant

6 TATE ANDALE LLC
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W F B M LLP (WALSWORTH)

Dated: February 26, 2024

By: 

Derek S. Johnson
Attorneys for Defendant
GENERAL ELECTRIC COMPANY

DATED: February 23, 2024

LEWIS BRISBOIS BISGAARD & SMITH LLP

By:



FLORENCE A. McCLAIN

GINA A. HARAN

Attorney for SB DECKING, INC., fka
SELBY, BATTERSBY & CO.

1 Dated: February 28, 2024

K&L GATES LLP

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3
4 By: /s/ Damon M. Pitt

5 Damon M. Pitt

6 Attorneys for Defendant

7 REDCO CORPORATION fka CRANE
8 CO.

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10 **IT IS SO ORDERED.**

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13 Dated: February 28, 2024

14 By: _____

15 Judge of the United States District Court

CERTIFICATE OF SERVICE

The undersigned counsel for Defendant ALFA LAVAL INC. hereby certifies that a true and correct copy of the forgoing document was filed with the Court and served electronically through CM-ECF (Electronic Case Filing) system to all counsel of record to those registered to receive a Notice of Electronic Filing for this case on February 28, 2024.

/s/ Ana T. Reeg

ANA T. REEG